

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

No.: 5:22-CV-00068-BO

YOLANDA IRVING, individually and as the  
natural parent and guardian of J.I., JUWAN  
HARRINGTON, CYDNEEA  
HARRINGTON, KENYA WALTON  
individually and as the natural parent and  
guardian of R.W., ZIYEL WHITLEY,  
DYAMOND WHITLEY, KAMISHA  
WHITLEY, and NANETTA GRANT as the  
natural parent and guardian of Z.G.

Plaintiffs,

vs.

THE CITY OF RALEIGH, Officer OMAR I.  
ABDULLAH, Sergeant WILLIAM ROLFE,  
Officer RISHAR PIERRE MONROE,  
Officer JULIEN DAVID RATTELADE, and  
Officer MEGHAN CAROLINE GAY, in  
their individual capacities,

Defendants.

**DECLARATION OF WILLIAM ROLFE**  
**(28 U.S.C. § 1746)**

WILLIAM ROLFE, under penalty of perjury, declares and states as follows:

1. My name is William S. Rolfe. I have personal knowledge of the matters set forth in this declaration and am competent to testify as to those matters.
2. I served as a sworn law enforcement officer with the Raleigh Police Department from October of 1995 until my retirement on February 1, 2023. I served as a Sergeant in the RPD for several years prior to my retirement, and was the Detective Sergeant for the RPD's Vice Unit during the years between 2017 until the late fall of 2020.
3. I had no involvement whatsoever in the investigation of the suspect Marcus VanIrvin, the controlled

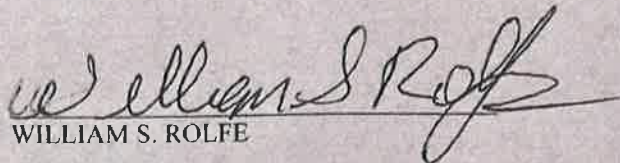
buy involving Mr. VanIrvin (which I was later told occurred on May 20, 2020), or the search of the Burgandy Street apartments. In fact, I was completely unaware of the events leading up to the search at issue in this lawsuit because I was on vacation in the North Carolina mountains during that week and was not scheduled to return to duty until May 26, 2020. I did not learn about the controlled buy involving Mr. VanIrvin, the application and issuance of the warrant, or the search itself until after all of those events had occurred.

4. I did not check the lab results for any of Detective Abdullah's cases in 2020. It was not my typical practice to review the results for the other detective's cases either, so he was not being treated any differently from the rest of the unit.

5. I have never served as a supervisor for the SEU Unit. Even if I had been working during the week at issue in this lawsuit, I would not have been tasked with supervising or directing the manner in which the SEU officers executed the search warrant because I did not know their standards or practices.

6. As I mentioned in my deposition, I did not believe (and still do not believe) that Detective Abdullah ever "conspired" with Dennis Williams to fabricate evidence. While Detective Abdullah may have been somewhat of a "loner" in the Vice Unit, I did not believe him to be dishonest and I do not recall any of the other officers in the unit ever telling me that they believed him to be dishonest either.

Executed under penalty of perjury this the 2<sup>nd</sup> day of April, 2023.

  
WILLIAM S. ROLFE